UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

: 04 cv 7959 (GEL)
MARCIA BREVOT, ECF CASE

:

Plaintiff, Electronically

: Filed

-against-

:

NEW YORK CITY DEPARTMENT OF EDUCATION,
JOEL I. KLEIN, Chancellor, New York City of
Education, MICHAEL LA FORGIA, Local

Education, MICHAEL LA FORGIA, Local
Instructional Supervisor, Region 9,
New York City Department of Education,
RICHARD J. CONDON, Special Commissioner,
New York City Office of the Special
Commissioner of Investigation for the
New York City School District, and
MARIE ZOLFO, Senior Investigator, New York
City Office of the Special Commissioner of
Investigation for the New York City School

: NOTICE OF MOTION FOR PARTIAL : SUMMARY JUDGMENT

:

Defendants.

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TO: BLANCHE GREENFIELD, ESQ.
ASSISTANT CORPORATION COUNSEL
100 CHURCH STREET, ROOM 2-142
NEW YORK, NY 10007

District,

PLEASE TAKE NOTICE that the undersigned, attorney for

Plaintiff, hereby moves for partial summary judgment on her claim

for a name-clearing hearing. In support of this motion,

Plaintiff shall rely on her declaration, the declaration of

Jeffrey E. Fogel, Plaintiff's Statement of Material Facts and a

Brief in Support of Motion for Partial Summary Judgment.

s/Jeffrey E. Fogel
Jeffrey E. Fogel (JF-3948)
New York Civil Liberties Union
Foundation
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New York, NY 10004
(212) 607-3363